

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

Global Force Entertainment, Inc. and Jeffrey)	
Jarrett,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:18-cv-00749
)	
Anthem Wrestling Exhibitions, LLC,)	
)	
Defendant.)	
)	

DEFENDANT'S MOTION FOR JUDGMENT AS A MATTER OF LAW

Pursuant to Rule 50(a) of the Federal Rules of Civil Procedure, Defendant Anthem Wrestling Exhibitions, LLC respectfully requests this Court to grant judgment as a matter of law on: (1) Defendant's license defense, which would bar liability on Plaintiffs' claims for (i) trademark infringement under the Lanham Act or Tennessee law, (ii) unfair competition under the Lanham Act or Tennessee law, (iii) trademark counterfeiting under the Lanham Act, (iv) alleged violations of the Tennessee Consumer Protection Act, (v) common law unjust enrichment, or (vi) alleged violations of the Tennessee Personal Rights Protection Act ("TPRPA"); (2) the invalidity of Plaintiff Global Force Exhibitions, Inc.'s ("GFE") trademark registration for the mark GLOBAL FORCE WRESTLING; (3) dismissal of GFE's claim for conversion; (4) dismissal of GFE's claim for negligence; (5) dismissal of Plaintiffs' claim for statutory damages under the Lanham Act; and (6) dismissal of GFE's claim for punitive damages. As discussed more fully in the memorandum filed contemporaneously in support of this Motion, these claims should be dismissed as a matter of law due to Plaintiffs' failure to present sufficient evidence at trial that would permit a reasonable jury to find for Plaintiff on these claims.

Respectfully Submitted,

BASS, BERRY & SIMS PLC

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CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2020, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following and/or served the following via U.S. Mail:

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